



**Valdi Licul**

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February 16, 2024

**VIA ECF**

The Honorable Taryn A. Merkl  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Trooper 1 v. Cuomo, et al.; Case No. 22-cv-00893 (LDH) (TAM)

Dear Judge Merkl:

As you know we represent the Plaintiff in the above-titled action. We write jointly with all parties pursuant to the Court's Order dated January 16, 2024, Dkt. 220. The parties have agreed to the following dates for completing discovery:

1. Date for Governor Cuomo's answer: June 4, 2024
2. Close of party discovery: August 22, 2024
3. Close of nonparty discovery: November 15, 2024
4. Close of expert discovery: December 15, 2024, with the parties to confer closer to this time to determine specific dates for initial disclosures, rebuttals and depositions of experts.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Valdi Licul", with a long horizontal flourish extending to the right.

Valdi Licul  
John S. Crain